

REMARKS

I. The Section 112 Rejections

Claims 9-11 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite.

Applicant has provisionally traversed this rejection. Applicant is not entirely clear as to the Examiner's rejection.

Claim 9 is directed at the transmission of packets from a mobile host within a subnet (U1) to a host outside subnet (U1), by encapsulating the packets within an encapsulating header that includes a group address Mx assigned to [a] first interface of [a] home router. Applicant notes that he has inserted the words --that includes-- and has deleted the words "whose destination address is" from claim 9.

Support for amended claim 9 can be found on page 12, last line to page 13, line 18 of the specification. This part of the specification describes the packet shown in FIG. 4. As shown in FIG. 4, the packet includes two destination addresses; one labeled "DST M1" and the other labeled "DST U2.x". Applicant notes that claim 9 is directed at the portion of the packet shown in FIG. 4 which relates to the M1 destination. Claim 11 is directed at that portion of the packet shown in FIG. 4 that relates to the U2.x destination. In sum, the packet shown in FIG. 4 includes a group address Mx (e.g., M1) which is claimed in claim 9 and the unicast destination address U2.x which is claimed in claim 11.

As shown in FIG. 2, the multicast address M1 is assigned to a first interface of a home router U1.1 not to a second interface as suggested by the Examiner. Applicant hopes that his amendment of claim 9 and the explanation above further clarifies claims 9-11 for the Examiner. Applicant respectfully submits that the amendments to claim 9 and the explanation above overcome the indefiniteness rejections raised by the Examiner.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the Section 112 rejections and allowance of claims 9-11.

II. The Section 103 Rejections

Claims 1, 2 and 4-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Perkins (RFC 2002 <http://www.ietf.org/rfc/rfc2002.txt?number=2002>, October 1996) (herein referred to as "Perkins") in view of Harvey et al., U.S. Patent No. 6,189,039 ("Harvey").

Each of claims 1, 2 and 4-14 require the mapping, at a second interface of a home router, of unicast addresses of packets received at a second interface and destined for members of a subnet (U1), to group addresses (Mx) assigned to members of the subnet, among other things.

As the Office Action admits, Perkins does not disclose such mapping. To overcome this deficiency, the Examiner relies on Harvey. Applicant respectfully disagrees and traverses this rejection for at least the following reasons.

The group addresses, Mx, which are used in the mapping step of claims 1, 2 and 4-14 are assigned to a first interface of a home router and to mobile hosts. In contrast, the "multicast sockets" referred to in Harvey are not

assigned to a home router and to mobile hosts. Instead, they appear to be assigned to users that are connected to a computer network. Thus, even if Perkins and Harvey can be combined, such a combination is not suggestive of the subject matter of claims 1, 2 and 4-14 of the present invention because such a combination does not disclose or suggest the mapping, at a second interface of a home router, of unicast addresses of packets received at a second interface and destined for members of a subnet (U1) to group addresses (Mx), where the group addresses (Mx) are assigned to a home router and to mobile hosts of a subnet, as in the claims of the present invention.

Accordingly, Applicant respectfully submits that the claims of the present invention would not have been obvious to one of ordinary skill in the art at the time the present application was filed upon reading the disclosures of Perkins and Harvey.

In addition, Applicant repeats its earlier position that there is no motivation to combine Perkins with Harvey. Perkins may arguably be related to the tracking of a mobile device. However, Harvey is unrelated to such tracking. There is simply no hint or suggestion in Harvey that the users which are part of its computer network are mobile or if they are mobile that they need to be tracked.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the pending rejection and allowance of claims 1, 2 and 4-14.

IV. Claim 3

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Perkins in view of Harvey and in further view of U.S. Patent No. 6,131,120 to Reid ("Reid").

Applicant respectfully submits that claim 3 is patentable over the combination of Perkins, Harvey and Reid for at least the reasons set forth above with respect to claim 1.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the pending rejection and allowance of claim 3.

Applicant notes that the amendment and rationales set forth herein are made to place the application in better condition for allowance and do not require an additional search on behalf of the Examiner.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number of the undersigned below.

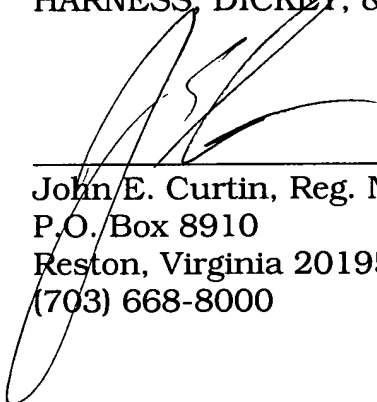
In the event this Response does not place the present application in condition for allowance, applicant requests the Examiner to contact the undersigned at (703) 668-8000 to schedule a personal interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

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By



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